

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL No. 2492

Master Docket No. 1:13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat Brown

**DECLARATION OF ALAN VASQUEZ
REGARDING DIRECT NOTICE**

I, Alan Vasquez, hereby declare and state as follows:

INTRODUCTION

1. I am the Director of the Larkspur Design Group (“LDG”), the in-house advertising agency of Gilardi & Co. LLC (“Gilardi”). Gilardi and LDG have been retained by the parties to design and administer the notice program in this matter.

2. I provide this declaration to (i) describe the method by which we will develop and validate the direct notice mailing database for the above-captioned litigation; (ii) estimate the percentage of the proposed settlement class to whom direct notice will be sent; and, (iii) estimate the cost of the direct notice component of the proposed notice plan.

3. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, can and will testify competently thereto.

PROPOSED METHODOLOGY FOR PROVIDING DIRECT NOTICE

4. Based on information from counsel, Gilardi understands that there are as many as 4.1 million current and former NCAA athletes who may be class members and that approximately 2.9 million records may be provided with full or partial address data for student-athletes.

5. Gilardi further understands that request letters and subpoenas (as necessary) will be sent to all NCAA member institutions requesting contact information (i.e., names, United States Postal Service (“USPS”) address data and email addresses) for all current and former students who participated in an NCAA-sanctioned sport. We further understand that consideration is being given to obtaining Social Security Account Numbers as necessary, but that a final decision has not been made on that issue.

6. The letters will direct member institutions to a dedicated website, to be developed and maintained by Gilardi, where member institutions can securely upload the requested student-athlete data. An optional template will be provided. The website will accept datasets conformed to the template as well as data that may not conform to the requested specifications.

7. Data received in the template provided will be aggregated into one file. Non-conformed data will be aggregated into a separate file for Gilardi’s data specialists to evaluate and normalize. Once the non-conforming data has been normalized and combined into one table with consistent fields, Gilardi will combine the data with other data that was provided in the correct format.

8. After these data normalization steps are complete, Gilardi will submit the entire data set for a National Change of Address (“NCOA”) update. The NCOA system provides updated addresses for individuals who have filed a change-of-address with the USPS in the past four years. Running the NCOA update also ensures that addresses are in the USPS-standard format for obtaining the best possible postage rate. It is anticipated that the NCOA-updated database will be used for the initial class mailing.

9. In addition to submitting postal records for NCOA update, Gilardi will also aggregate any email addresses in the data provided and create an email table for direct notice

dissemination of emails. Prior to the email dissemination, however, all addresses will be assessed by a third party vendor to determine deliverability and ensure accuracy.

10. Gilardi's standard mass email procedures include attempting to deliver the email three times to each available email address before considering the effort a "bounce back." In Gilardi's experience with mass email dissemination, however, approximately 10% to 20% of the emails bounce back undelivered. In order to be conservative and take into consideration the potential varying age of the email data to be provided, Gilardi estimates that 30% of the emails will bounce back. If potential class members have both an associated email address and USPS address, Gilardi has been directed to disseminate notice to both addresses.

11. Statistics from Gilardi's thirty years of experience in class action claims administration show that USPS-returned undeliverable rates ("RUM") generally fall between 10% and 20% of the volume of mailed pieces. In order to be conservative considering the age of the potential data for direct mail, Gilardi estimates that approximately 30% of the USPS-mailed pieces will be returned as undeliverable. For any mailed notices that are returned undeliverable by USPS, Gilardi will perform supplemental address searches through Accurint, a division of Lexis Nexis, which uses information from public records to locate and return updated address information. While Accurint is constantly updating data sources used for address search services, Exhibit 1 provides a high level summary of the sources and Accurint's procedures. Results from the Accurint searches will be used to update the mailing database. Notices will be re-mailed to any updated addresses found. In Gilardi's experience, Accurint searches will yield last-known addresses for approximately 50% of individuals with no associated Social Security Account Number whose initial direct notice was returned undeliverable and approximately 80% of individuals for whom Social Security Account Numbers are available. We, in turn, anticipate

that some NCAA colleges and universities will have some Social Security Account Numbers for alumni. Whenever available, Gilardi will utilize that data for address search purposes, as directed by the parties and ultimately the Court.

12. The estimated cost for the efforts to compile the class list and to disseminate direct notice to the class members for whom an email and/or postal address is available is dependent on the volume of email addresses available and the results of address search efforts on RUM. Using the percentage assumptions for email bounce backs, returned mail and address searches outlined in the paragraphs above, however, Gilardi estimates that direct notice will be sent to a last-known address for between 60% and 63% of the proposed settlement class.

13. Attached as Exhibit 2 are three scenarios outlining the search and estimating direct mail costs. Scenario #1 assumes that address information will be available for 2.9 million members of the proposed settlement class. It assumes that no email addresses will be made available and that direct notice will be sent via USPS mail to 2.9 million members of the settlement class. The estimated cost of direct notice under Scenario #1 is \$1,115,514. As depicted in Scenario #2, the cost of direct notice would be \$1,175,506 if 50% of the 2.9 million class members for whom contact information may be available had usable email addresses and both email and mailed notice were sent to members of the proposed settlement class who had a usable email address. In that regard, however, our understanding is that the parties are proposing to send direct, mailed notice to all persons for whom a name and address is available without regard to whether such persons also have email addresses. Accordingly, in Scenario #3, the cost of direct notice would be \$1,572,245 if direct notice were sent by USPS mail to the entire proposed settlement class, an estimated 4.1 million class members.

14. Assuming that contact information is available for 2.9 million members of the proposed settlement class, the total cost of implementation of the proposed Notice Plan (as amended) will be between approximately \$1,444,009 and \$1,496,944, which amount includes all expenses associated with direct, mailed notice as well as all expenses associated with the various forms of indirect notice that are called for by the Notice Plan.

15. Gilardi understands that some NCAA member institutions may maintain alumni contact information in formats that do not differentiate between athletes and non-athletes. Gilardi has researched available online resources that could be used to determine whether individuals identified on such lists played an NCAA-sanctioned sport while in college. A list of potential resources is attached as Exhibit 3. Any individuals for whom some contact information is provided, but who are not identified as being student-athletes in the contact data provided by a member institution, will be placed into a table to be sorted by school and by location. Gilardi staff can research the websites for matching names to identify additional class members. Direct, mailed notice can then be sent to alumni who, through these research efforts, are identified as class members. Although it is difficult to fully predict the likelihood of successfully using these online resources to identify class members, Gilardi will explore ways to make efficient use of these resources and make best efforts to attempt to maximize the direct notice component of the notice plan.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 22nd day of February, 2015, at San Rafael, California.

A handwritten signature in black ink, appearing to read 'Alan Vasquez', written over a horizontal line.

Alan Vasquez

EXHIBIT - 1

LexisNexis® Risk Solutions Data Dictionary

**Version 2.43
January 15, 2013**



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CONSUMER

Overview

LexisNexis Risk & Information Analytics Group's consumer databases include personal information on subjects such as dates of birth, addresses, Social Security numbers, etc. Sources include a variety of public record databases, numerous phone data sources, and credit header data. While other services rely more heavily upon credit header searching, LexisNexis' Risk Solutions technology incorporates a wider variety of sources to provide the most current and comprehensive database.

LexisNexis' Link ID employs algorithms that provide a single, consolidated view of each of the unique identities contained within disparate repositories of person-centric information.

Consumer Database

The LexisNexis primary consumer database is updated monthly utilizing all available consumer information received, including credit bureau data, driver's license information, resident services file information, phone numbers, and current and historical addresses spanning 33 years. The 15.3 billion consumer records contained in this consumer database are used to create unique identifiers. The non-SSN-dependent unique identifier forms the basis of the LexisNexis search technology.

Field Elements

- Dates of Birth – Over 7.8 billion records contain date of birth information from a variety of different consumer sources. Examples of the types of sources that may contain dates of birth are credit headers, utilities, driver's licenses, voter registrations, professional licenses, marketing files, and non-credit-header consumer files.
- Addresses – Our database contains approximately 8.2 billion unique name/address combinations that map to over 683 million unique identities. The unique identities are further enhanced to remove any that are known to belong to deceased individuals, are inactive or appear to be duplicates; referred to as current active list. The current active list contact contains over 267 million identities. If an address has a potential risk, we will display a yellow flag below the address with one or more of the following risk indicators:

Hunting, Trapping, And Game Services	Residential Mobile Home Site Operator	Credit Reporting Services	General Medical And Surgical Hospitals	Libraries
Newspaper Facility	Hotels And Motels	Direct Mail Advertising Services	Psychiatric Hospitals	Individual And Family Social Services
US Postal Service	Rooming And Boarding Houses	Photocopying And Duplicating Services	Home Health Care Services	Residential Care Facility
Water Transportation Of Freight, Not Elsewhere Classified	Sporting And Recreational Camps	Skilled Nursing Care Facilities	Elementary And Secondary Schools	Correctional Institution
Packing & Crating Facility	RV Parks And Campsites	Intermediate Care Facilities	Colleges & Universities	National Security
Telegraph And Other Message Communications	Tax Return Preparation Services	Nursing And Personal Care Facilities	Junior Colleges And Technical Institutes	

- SSN's – 10.1 billion consumer records containing Social Security numbers and 4.2 million containing individual taxpayer identification numbers (ITIN's) are available. We provide verification of an SSN against the SSN Death Master and an SSN issued-date file.
- AKA's – The database also contains access to alternate identity information, such as alternative name spellings, all names using an SSN, and all SSN's that may be associated with an individual.
- Address History – Dates are provided on the record, when possible, to identify the first and last time that an individual was associated with a particular address.



CONSUMER

Relatives and Associates

Our Relatives and Associates file consists of approximately 2.6 billion records, which represent potential relatives and associates. These associations are made using complex algorithms based on relationships established by utilizing available field information within various types of source data. "First-degree relative" includes mother, father, sister, brother, husband, wife, and child over the age of 18. "Associate" means a person that has lived with a subject in two or more places but does not share the same last name.

Other Consumer Data

- The Resident Services File (phone, internet, satellite, cable, electric, gas, water, fuel, etc.) is also available. This information may be useful in indicating a new move for an individual.
- Several aggregated consumer demographic files are available. Consumer Universe contains demographic and lifestyle information for 131.3 million consumers. The Tracker database provides field elements such as name, address, phone, SSN, and partial date of birth. The Total Source database contains consumer and household data that has been enhanced with a wide variety of demographic, lifestyle, and geo-demographic attributes. Data for up to five individuals is available per household. This file is restricted to marketing use only.
- The High School Student and Young Adult file, comprised of high school students and young adults (ages 20 to 36 years old), includes name, full address, phone number, age, class year, gender, date of birth, school type, and school name. [View Coverage](#)
- The U.S. Military Locator is a historical file that contains information for U.S. military personnel in the Air Force, Army, Coast Guard, Marine Corps, and Navy. The file may contain name, military address (when available), branch of service, pay grade code, gender, rank, primary Military Occupational Specialty (MOS) code, active service date, date assigned to current duty station, estimated date of separation, and date separated.
- The Alaska Permanent Fund file provides name and address information for residents of Alaska who received the permanent fund dividend from 1982 to 2004.
- Death records sourced from the Social Security Administration (SSA) for 50 states plus DC include approximately 110 million individuals since 1911 for whom the SSA paid benefits. Additional individual state death repositories are available, which contain additional field elements such as cause, condition, location, and time of death. State death coverage additional updating and historical information. [View Coverage](#)
- The SSN Issue file provides the date range during which a particular SSN was issued and the state or locality of issuance. Coverage for this file starts in 1936 to present and updates monthly.



PHONE & EMAIL DATA

Overview

LexisNexis phone data consists of the most current telephone subscriber information and historical data on individuals and businesses. Subscriber information on landlines, cell phones, unlisted numbers, and unpublished numbers is included.

Coverage Summary

- The national Electronic Directory Assistance (EDA) file consists of 102.3 million total records and 79.6 million unique phones: 66.6 million are residential, 12.4 million are business, and approximately 571,392 are combined-use business and residential numbers. In addition, the EDA database consists of approximately 948.5 million historical telephone records. The EDA database updates daily for listing changes, new connections, and new disconnections.
- The Phones Plus file delivers access to approximately 421.8 million phone numbers not currently found in EDA. This database contains 249.3 million unique phone numbers, which have met the threshold of using a scoring algorithm for validity. Of the phone numbers included, 84% are likely cell phones. The Phones Plus file is updated weekly.
- Other sources of phone data include a national White Pages database of 109 million records and 13.9 million Yellow Pages records. In addition, the Canadian Phone file provides access to 342 million records from all Canadian Provinces & territories, of which there are over 2.3 million unique Canadian Business Phone Numbers and 15.3 million unique Residential Phone Numbers.
- In addition, several other files are available which provide phone number metadata. These include the TDS file, which maps area codes and dedicated exchanges to phone types (land, cell, etc.); the TPM file, which utilizes latitude and longitude coordinates to determine where an exchange may be located; and a file that provides lists of ported phones.
- The email address file allows users to see possible email addresses for their subjects. The file includes name, email address and postal address. Our database provides access to over 1.6 billion records, with 473 million unique email addresses. In addition, approximately 80% of the email addresses are tied to a unique identity. Coverage for this file is national and updates monthly.



ASSET DATA

Overview

LexisNexis provides access to various sources of assets, including over 3 billion motor vehicle registration records, approximately 717 million vehicle title records, and 62 million watercraft registration records. Nationwide aircraft registrations are also available.

Coverage Summary

- The Motor Vehicle Registration file contains information on individuals or corporations who have registered or titled motor vehicles with a state motor vehicle registration agency. Information includes license/tag plate numbers. [View Coverage](#)
- The Watercraft Registration file contains information for individual states plus nationwide USCG registrations. [View Coverage](#)
- The Federal Aviation Administration (FAA) file includes national plane registration coverage. The coverage range for this file is January 14, 1977 and ranges to present. The Federal Aviation Administration file is updated monthly. [View Coverage](#)
- In addition, Vehicle Identification Numbers (VINs) are available to provide enhanced information for motor vehicles, including make, model, color, safety features, etc.



REAL PROPERTY DATA

Overview

Our personal property data coverage includes almost 95% of the United States population base and represents approximately 3.4 billion records. LexisNexis's real property data is a combination of information from the real estate fabrication industry's two largest and most respected fabricators, and is unrivaled in both depth of historical coverage and current updating coverage.

These real property records include data originating from tax assessors and property recorders' offices. LexisNexis is the only major commercial provider of real property data that maintains archived tax assessor records, and in most cases a 5-year archive is available. Also included are mortgage and deed records containing county courthouse real estate records for selected states. The mortgage materials include both purchase-money and non-purchase-money loans. The term "mortgage" includes both mortgages and deeds of trust. Data for these files comes primarily from the records of recorders' offices and market sources.

Coverage Summary

- The Property Assessment file can include multiple owner names, multiple seller names, property address, owner address, value of property, land value, parcel number, year of sale, prior sales date, homestead exemption, and additional property characteristics. The Property Deed/Mortgage file can include multiple buyer names, multiple seller names, borrower information, loan type, interest rate, and interest rate type. Property deed images are also available for select counties and states. [View Coverage](#)
- The Foreclosures file includes information on legal proceedings initiated by a creditor to repossess the real property collateral for a mortgage loan. [View Coverage](#)



LICENSING INFORMATION

Overview

LexisNexis provides access to a variety of license and permit information. The license and permit data includes over 94 million Hunting and Fishing license records, 3 million Concealed Weapons Permit records, 7.9 million Pilot records, and 122.7 million Professional License records.

Coverage Summary

- The DEA Controlled Substances file contains individuals registered under the Controlled Substances Act (CSA). Coverage for this file is national and updates monthly. [View Coverage](#)
- The Federal Firearms and Explosive License file contains the names of licensees who are registered with the Federal Bureau of Alcohol, Tobacco, and Firearms. Coverage for this file is national and updates monthly.
- Several files providing information on physicians and other healthcare providers, including sanction (disciplinary action) information, are also available.
- Federal Communications Commission (FCC) Licenses Including Wireless, Radio, and Television Licenses. Coverage for this file is national, begins November 15, 1987, ranges to present, and updates quarterly.
- The Driver's Licenses file provides access to driver's licenses for various states. [View Coverage](#)
- The Voter Registrations file covers various states. [View Coverage](#)
- The Professional License file contains coverage for various states. There are a variety of current and historical license types available.
- The Concealed Weapons Permits file covers various states and includes current and historical coverage. [View Coverage](#)
- The Hunting/Fishing License file covers various states and includes current and historical coverage. [View Coverage](#)
- Marriage and divorce records come from various state and county offices. [View Coverage](#)



BUSINESS & EMPLOYMENT DATA

Overview

LexisNexis collects business data on millions of companies, both international and domestic. The LexisNexis database contains approximately 1.2 billion business records and approximately 2.1 billion business contact records, which represent 374 million unique businesses and 1.2 billion unique contacts. LexisNexis employs algorithms to calculate a business identifier, which provides a single consolidated view of each of the unique business identities contained within disparate repositories of business-centered information.

This data includes 11.7 million Federal Employer Identification Numbers (FEINs). Approximately 19% of unique businesses have an assigned SIC code. LexisNexis business information is drawn from such sources as Dun & Bradstreet (D&B), state incorporation filings, UCC filings, business registrations, and other aggregated sources.

In addition, proprietary linking technology is utilized to compile the People at Work file, which contains over 2.1 billion records and links 324 million unique individuals to businesses. Available information includes business addresses, phone numbers, and possible dates of employment.

Coverage Summary

- Our Corporation Filings database contains various types of business filings, including incorporations, limited liability companies, and limited partnerships. Information may include company name, registered agent, corporate officers, and filing dates. LexisNexis has rolled up the corporation filings to the Charter Number, allowing you to pull just one Corporation Report for all of the filings on that Charter Number. We have also added the name type to the search results, which will reveal if the business name is the legal name or trade name. [View Coverage](#)
- Our national Uniform Commercial Code (UCC) file contains approximately 140 million UCC lien filings containing the financing statement information filed with the Secretary of State. LexisNexis allows users to search by original filing number or FEIN and to narrow results by using the filing date range or filing jurisdiction. [View Coverage](#)
- The search results and report may include the following fields:
 - Filing Jurisdiction
 - Filing Status
 - Original Filing Number
 - SSN/FEIN for Debtor, Creditor, Secured, and Assignee
 - Filing Pages
 - Document Amount
 - Collateral Quantity
- The Internet Domains file includes historical Internet registration information. Coverage for this file is national and is non-updating.
- The FEIN file contains Federal Employer Identification Numbers assigned by the Internal Revenue Service to business entities expected to file federal tax returns. The file includes the business name, address, and information source. Coverage for this file is national, begins January 1, 1994 to present, and updates quarterly. [View Coverage](#)



BUSINESS & EMPLOYMENT DATA

Coverage Summary – continued –

- Our Dun & Bradstreet® file contains address, DUNS number, annual sales, officers and directors, SIC code, etc. Coverage for this file is national from October 20, 1980 to present. The Dun & Bradstreet file is a monthly update.
- The U.S. Securities and Exchange Commission (SEC) requires a public company in the United States to file financial statements regularly for public availability. Investors and financial professionals rely on these filings for information about companies that they are evaluating for investment purposes. Filing types include registration statement, statement of changes in ownership, prospectus information, information on proposed sale of securities, registration of securities of foreign private issuers, annual report, etc. This file also includes over 1.68 million insider-trading filings back to 1980. Coverage for this file is national and updates monthly.
- Business credit reports are now available and provide valuable information regarding how a company is performing financially and how that company compares against other businesses in the same industry. Business credit reports can help companies complete their business due diligence quickly and easily. Coverage for this file is national from September 5, 2005 to present, and updates weekly.
- Our IRS files contain Annual Return/Report of Employee Benefit Plans as well as IRS reported non-profit charitable organizations.
- Many additional sources of business filings are collected both direct and from aggregators. These include business registrations, fictitious business filings, gaming licenses, liquor licenses, lottery agents, sweepstakes licenses, sales tax registrations, and FCC licenses. *Coverage available upon request.*
- Several other national business and employment files are available from aggregators, including a U.S. Business and Executive file and a National People at Work file.



LEGAL INFORMATION

Overview

LexisNexis collects a variety of legal information, including bankruptcies, liens, and judgment data. This information updates frequently—guaranteeing that investigators have the most complete and up-to-date view of a search subject.

Coverage Summary

- Our Bankruptcy file includes personal and business bankruptcy filings dating back to 1990. Bankruptcy filings can include chapter filed, disposition, attorney information, trustee information, asset availability, creditors' meeting date and location, and more. [View Coverage](#)
- The Judgments and Liens file may include debtor's address, filing type, filing date, filing location, and more. [View Coverage](#)
- The Civil Court file contains state and county level coverage. [View Coverage](#)
- The Official Records file contains several different types of documents. In the State of Florida, official records are those instruments required or authorized for recording in one general series called "Official Records" at the county level. Document types you might find in an official records search may include, but are not limited to, the following ([View Coverage](#)):
 - Affidavit, agreement, assignment, bond, certificate, certified copy of court judgment, declaration of condominium, court paper, death certificate, deed, easement, financing statement, judgment, lien, lis pendens, marriage record, military discharge, modification, mortgage, notice, order, partial release, plat-related filing, power of attorney, probate document, release, restriction, satisfaction, termination, and transfer.
- The Florida Traffic Accidents file updates annually and contains reports for the State of Florida. Coverage for this file begins January 1, 1986 to present and updates annually. [View Coverage](#)



DEROGATORY INFORMATION

Overview

LexisNexis provides a robust collection of derogatory information, including statewide criminal courts, Departments of Corrections, county arrest records, county criminal court records, and Sex Offender Registries (SOR). We provide access to approximately 302 million criminal records: 1.5 million sexual offenders, 42 million Department of Corrections records, 242 million criminal court records, and 17 million arrest records.

Coverage Summary

- Depending on the state, the Department of Corrections information will include historical and current data on statewide felony and misdemeanor convictions, statewide current inmates, institution rosters, and photos where available. Updating criminal court filings are available. County arrest log records are available at the state and county level. [View Coverage](#)
- Sex Offender Registry coverage is available. [View Coverage](#)
- The Watch List file provides access to 24 sources, including 31 thousand Office of Foreign Asset Control records, UN Named Terrorists, and a variety of other agency lists. In addition, the World Check file is available for batch processing. This file is updated daily. [View Coverage](#)

LEXIS RISK SOLUTIONS ONLINE DATA DESCRIPTIONS			
Search Name	Data Returned	Update Frequency	File Description
LexisNexis Identity Trace	Names, Address, SSN, DOB, employment information, inquiries and fraud/risk information.	Daily	An FCRA regulated service provided by LexisNexis which allows gateway access connection to non-trade information in a consumer's credit report for the purposes of determining the High Risk Fraud Alerts associated with the input or on-file SSN and Address as well as Input Phone Number.
Find a Person	Name and name variations, current and former addresses, telephone numbers, SSN, DOB	EDA Phone File - Daily Other Data -Update schedules vary	A database combined from over 1500 sources containing nationwide person locator information for approximately 400 million unique individuals based in the US and territories. Sources include all three national credit reporting companies, current and historic address files, phone publishers, the Electronic Directory Assistance database, Social Security death records from the Social Security Administration, numerous public record sources and data collected by marketing, registrations and warranty card aggregators.
SSA Verify	SSA - 89	N/A	A link which is used to generate form SSA- 89 which is filed to enable verification of Social Security information on individuals directly from the Social Security Administration.
IRS Verify	IRS Form 4506 - T	N/A	A link which enables authoritative due diligence of income and financial information on individuals and businesses. Used to generate IRS Form 4506 - T which is used to order Forms 1040 or 1041, Form 941, 1065 or 1120 and Forms W-2, 1099, 1098 and 5498 directly from the source.
InstantID® Consumer Verification	CVI, NAP, NAS	N/A	InstantID is an identity verification and validation service designed to provide positive verification and validation of consumer identity information (first and last name, social security number, date of birth, home address and home phone number). InstantID summarizes the results of identity verification into an easy to use identity confidence score called the Consumer Verification Index (CVI). It is a score matrixed from both name/address/phone indices (NAP) and name/address/ssn indices (NAS).
InstantID® Consumer Verification with Red Flags & FraudPoint® Score	CVI, NAP, NAS, Fraud Score, Report which highlights High Risk Factors	N/A	Same as above with an additional score called FraudPoint. FraudPoint® provides a score that helps identify characteristics indicative of fraud and material misrepresentation that are not obvious in the verification and validation process. And provides an easy to understand numeric score and reason codes to pinpoint high-risk applicants. The scoring model predicts true-name and synthetic name fraud, legitimate customers who may be more likely to commit fraud, and first-pay defaults. The LexisNexis® Red Flags Rule Report identifies suspicious personal identifying information and displays warning codes when red flags risk factors are present. Red flag alerts warn users of suspicious activity with warning conditions or red flag alerts, clearly associated with red flags guidelines. Users will be alerted to suspicious personal information such as false or disconnected telephone numbers, miskeyed or mismatched social security numbers, invalid zip codes and more.
InstantID® Q&A	Out of Wallet Questions	NA	An Identity authentication product which generates a series of knowledge based authentication questions and tracks and records results. The configuration as to question types, numbers, correct answers required and time to answer is extremely flexible.
LexisNexis® Identity Report	see description		LexisNexis® Identity Report provides deep identity intelligence, risks associated with personally identifiable information and additional details on associated data and subjects linked to the primary identity. This information helps identity characteristics indicative of fraud and material misrepresentation that are not obvious in the verification and validation process. It provides easy to understand risk indicators to pinpoint possible high-risk applicants.
People at Work	Name, place of employment, employment address, telephone numbers, SSN, possible dates of employment	Monthly	A database which links over 160 million individuals to businesses utilizing multiple redundant business public record databases and publicly available data.
Phone Lookup	Name, address, telephone number	Daily	A database which contains the nationwide Electronic Directory Assistance data.
Phones Plus	Name, address, telephone number, carrier	Monthly	The Phones Plus application provides access to over 200,000,000 phone numbers not typically published, including cell phone and unlisted numbers.
LexisNexis Phone Finder	Name, Address, Best Phone, Other Phones, Phone Detail	Real Time	A data search option which combines the data in Find a Person, Phones Plus and gateways to three additional databases real time to present the best phone data available for an individual or address and the detail about the time that phone has been associated with that person and address, other numbers which relate to that person or address and details related to the type and issuer of the phone.
Bankruptcies	Petitioner(s), SSN/FEIN data, Jurisdiction, case number, chapter, filing date, filing status, trustee, attorney	Daily	A file of personal and business bankruptcy filings from 50 states, District of Columbia, Guam and Puerto Rico. All US Bankruptcy District Courts are contained in this file as well as all Chapters. Date coverage may vary depending on the District Court but most coverage begins with 1991 filings.
Driver Licenses	Name, Address, license issue and expiration date, license type, DOB, height, weight, hair color, eye color		Contains Driver's License information for all registered drivers from the following states:
		Monthly	26 states available: 13 updating states: CT, FL, LA, ME, MI, MN, NE, NV*, OH, TN, TX, WI, WY. 13 states historical - CO, DE, ID, IL, KY, MD, MA, MO, MS, NH, ND, SC, WV
Drug Enforcement Administration Registrants	Name, Address, SSN, Business Type, License Number, License Date	Monthly	The DEA Registrants file contains records from 50 states plus DC. Everyone that has a license to distribute controlled substances with the Drug Enforcement Agency under the Controlled Substances Act under their individual name.
Federal Firearms and Explosives Licenses	License Name, Trade Name, SSN, Address, Telephone Number, License Number, License Type, Expiration Date, County, IRS Region	Monthly	The Federal Explosives and Firearms licenses registered with the Federal Bureau of Alcohol, Tobacco and Firearms coverage includes 50 states plus DC.
Email Address/Social Network Report	Name, Address, SSN, E-Mail addresses	Daily	The Email Address search can be used to find an email address for an individual or to reverse search to find the individual that belongs to the email address. The LexisNexis® Social Network Report helps identify e-mail addresses associated with more than 35 social networking sites, returning new insight and perspective on individuals.
Real Property	Owner(s)' Name(s), property and tax mailing addresses, parcel number, property use, property characteristics, valuation information, sales information	Varies by jurisdiction	A national file contain tax assessor, deed transfer and mortgage information. For coverage, see attached.
Motor Vehicle Registrations	Owner name and address, registrant name and address, lien holder information, title date, plate number, VIN, make model, year and color of automobile,		Contains information on individuals, corporations, or other organizations who have registered or titled motor vehicles with any of the following states:
		Bi-monthly	29 state plus D.C. available: 24 states current + D.C. - AK CO FL ID IL KY LA ME MA MI MN MS MO MT NE NV NM NY OH TN TX UT WI WY
			5 states historical - AL CT DE MD SC
Boat Registrations	Owner's name and mailing address, Registration number, date, and county, Title number, Decal number, Hull Identification number, Vessel make, model, year, and length, Vessel propulsion and fuel type, Vessel use information	Bi-monthly	Contains information from 34 states on individuals, corporations, or other organizations who have registered or titled boats with any of the following states: AK, AL, AZ, AR, CO, CT, FL, GA, IA, IL, KS, KY, ME, MD, MA, MI, MN, MO, MS, MT, NC, ND, NE, NV, NY, OH, SC, TN, TX, UT, VA, WV, WI, WY
Aircraft Registrations	Owner's name on the current registration, Mailing address, Registration information, Aircraft and engine information	Monthly	Contains United States Aircraft registrations from the Federal Aviation Administration for the entire United States.
FAA Pilots Licenses	Name, address, status, medical classification, class, certification date and expiration date.	Annually	National

Professional Licenses	Names, Address, License Type, License State, License Number, Status, Issue and Renewal Dates	Varies by state	National. License Types vary by state.
Concealed Weapons Permits	Names, Address, License Type, License State, License Number, Status, Issue and Renewal Dates	Varies by state	Arkansas, Florida, Indiana, Louisiana, Maine, North Dakota, Tennessee and Virginia
Hunting/Fishing Licenses	Names, Address, License Type, License State, License Number, Status, Issue and Renewal Dates	Varies by state	ALABAMA (Historical), ALASKA, ARKANSAS, CONNECTICUT, FLORIDA, GEORGIA, ILLINOIS, MASSACHUSETTS, MINNESOTA (Historical), MISSISSIPPI, MISSOURI, MONTANA, NEVADA, NEW JERSEY (Historical), NORTH CAROLINA (Historical), NORTH DAKOTA, OHIO, OREGON, UTAH, VIRGINIA, WISCONSIN
E-mail Search/Social Networking Report	Name, Address, E-mail Address/Business and Social Networking sites linked to the relevant e-mail .	Daily	<p>The Email Address Search can be used to find an email address for an individual or to reverse search to find the individual that belongs to the email address. The LexisNexis® Social Network Report targets access to more than 35 social networking sites, returning new insight and perspective on individuals in minutes.</p> <p>Clients supply the subject's email address or LexisNexis® generates the email address after the user conducts an email address search. The Social Network Report provides the end user with a list of all matching social network public-facing pages (URLs) for the search subject in cases where a match to the sites' registered email address is found.</p>
Foreclosures	Mortgagor, Buyer, Property Address, Tax Mailing Address, Parcel Number, Brief Legal Description, Recording Date	Varies by State	A national file containing completed foreclosure matters.
Judgments and Tax Liens	Debtor name and address, creditor name, case or lien number, filing and/or release dates, liability amount	Weekly	A nationwide file containing judgments taken in the courts of general jurisdiction in most every county in the US, plus any judgment certified or abstracted at the county clerk's office and state and federal tax liens from every state.
Federal Civil & Criminal Docket Summaries	Party names, jurisdictional information, case number, filing/offense dates, case type, case status or disposition	Daily	Federal Criminal and Civil filings for 49 states (no filings for Alaska) the District of Columbia and Puerto Rico.
State Civil & Criminal Filings	Party names, jurisdictional information, case number, filing/offense dates, case type	Varies by state - most monthly	The Civil and Criminal file is a group file of civil filings from 20 states plus DC and criminal filings from 11 states.
Criminal Records	Party names, jurisdictional information, case number, filing/offense dates, case type, case status or disposition	Varies by state - most monthly	<p>The Criminal file is a collection of criminal history information, including statewide criminal court, department of corrections, county arrest records, traffic violations and county criminal court records.</p> <p>Arrest Logs - County Arrest Records are available for select counties.</p> <p>Updating coverage is available for AL, AZ, AR, CA, CO, FL, GA, ID, IL, LA, MI, MO, MT, NC, NM, OK, OR, TN, TX, WA, and WV.</p> <p>Department of Correction - Depending on the state, information will include historical and current data on statewide felony and misdemeanor convictions, statewide current inmates, and institution rosters.</p> <p>Coverage includes 45 states including DC. Updating states include: AL, AZ, AR, CO, CT, FL, GA, ID, IL, IN, KS, LA (Parole Board information only), MD, MI, MN, MS, MO, MT, NE, NH, NM, NJ, NY, NC, NV, OH, OK, OR, RI, SC, & TN.</p> <p>Historical coverage includes: DC, GA, IA, KY, LA, ME, PA, TX, UT, VA, WA, WI & WV.</p> <p>Criminal Court Filings - Includes statewide coverage for 22 states.</p> <p>Updating states include - CT, HI, IA, MD, NC, NJ, OK, PA, TN, UT, WA & WI.</p> <p>Historical states include: AK, AR, AZ, FL, GA, MN, MS, OR, RI & VA.</p> <p>Select additional county coverage is provided for updating - AZ, CA, CO, FL, GA, IL, LA, MI, MS, NM, OH, OK, SC, TN, TX.</p>
OFAC and other watch lists	Name, Sanctioning Body, DOB, address, designation	As updated by Office of Foreign Asset Control	<p>The file contains the following interdiction lists:</p> <ul style="list-style-type: none"> • Australian Reserve Bank Businesses • Australian Reserve Bank Individuals • Bank of England Sanctions • Commodity Futures Trading Commission List of Regulatory and Self-Regulatory Authorities • Defense Trade Controls (DTC) Debarred Parties • FBI Fugitives, 10 Most Wanted, Most Wanted Terrorists and Monthly Most Wanted • Financial Crimes Enforcement Network Special Alert List • Foreign Agent Registrations • International Police Most Wanted • Office of Foreign Assets Control • OFAC - Enhanced Sanctioned Countries • Office of Controller of Currency of Unauthorized Banks • OSFI - Canada • Palestinian Legislative Council • Politically Exposed Persons • State Department Terrorist Exclusions • Terrorists Inside of European Union • Terrorists Outside of European Union • United Nations Named Terrorists • US Bureau of Industry and Security - Unverified Entity List • US Bureau of Industry and Security - Denied Entity List • US Bureau of Industry and Security - Denied Person List • World Bank Ineligible Firms <p>Explanation of OFAC:</p> <p>The Office of Foreign Assets Control ("OFAC") of the U.S. Department of the Treasury administers and enforces economic and trade sanctions against targeted foreign countries, terrorism sponsoring organizations and international narcotics traffickers based on U.S. foreign policy and national security goals. OFAC acts under Presidential wartime and national emergency powers, as well as authority granted by specific legislation, to impose controls on transactions and freeze foreign assets under U.S. jurisdiction. Many of the sanctions are based on United Nations and other international mandates, are multilateral in scope, and involve close cooperation with allied governments.</p>

Jury Verdicts and Settlements	Parties, Attorneys, Expert Witnesses, Dates, Amount, Cause of Action Description	Varies by publication	State and Federal Jury Verdict and Expert Witness Reporters including the following: AK Jury Verdicts & Settlements, Alabama Jury Verdict Reporter, Alabama Jury Verdicts, AL Civil Trial Reporter, Arizona Litigation Reports, Arkansas Jury Verdicts and Settlements, California Jury Verdicts and Settlements: CT JAS Publication, CT Jury Verdict Review & Analysis, DC Metro Verdicts Monthly - DC, VA and MD, expert4law - The Legal Marketplace, LA County Bar Association Expert Witness Directory, Federal Jury Verdict Reporter, FL Jury Verdict Reporter, FL Jury Verdict Review & Analysis, GA Trial Reporter, Idaho Jury Verdicts & Settlements, Indiana Jury Verdict Reporter, JurisPro Expert Witness Directory, Kentucky Trial Court Review, Louisiana Jury Verdicts and Settlements, MA JAS Publication, MA Jury Verdict Review & Analysis, MD Metro Verdicts Monthly, Medical Litigation Alert, ME Jury Verdict Review & Analysis, Mississippi Jury Verdicts and Settlements, Missouri and Illinois Jury Verdicts, MI Trial Reporter, National Jury Verdict Review & Analysis, New York State Jury Verdict Review and Analysis, NH Jury Verdict Review & Analysis, NJ Jury Verdict Review & Analysis, North Texas Reports, OH Trial Reporter, Oregon Arbitration Decisions, Oregon Jury Verdicts & Settlements, PA Jury Verdict Review & Analysis, RI JAS Publication, RI Jury Verdict Review & Analysis, SEAK National Directory of Experts, SEAK National Directory of Independent Medical Examiners, Tennessee Jury Verdict Reporter, Tennessee Jury Verdicts and Settlements, Texas Trial Reports, Twin City Jury Verdicts Reporter, TX Reporter Soele's Trial Report, UT Rocky Mountain Verdicts & Settlements, VA Metro Verdicts Monthly, Verdicts, Settlements and Tactics, VT Jury Verdict Review & Analysis, Washington Arbitration Decisions, Washington Jury Verdicts & Settlements, Wisconsin Jury Verdicts and Settlements
Marriage/Divorce Records	Party names, marriage/divorce date and county, certificate and case numbers	Varies by state - most monthly	Marriage and Divorce Records from the following states: CO, CT, FL, GA, KY, NV, NC, TX
Sexual Offenders	Name, AKA(s), address, DOB	Varies by state	National
Voter Registrations	Name, Address, DOB, Registration Number, Precinct	Yearly	Voter registration information from the following states: AL, AK, AR, CO, CT, DE, DC, GA, IL, KS, LA, MI, MO, MT, NJ, NY, NC, NV, OH, OK, OR, PA, RI, SC, TX, UT, WA
Mortgage and Financial Institutions Sanctions	Name of the individual or institution, jurisdiction, agency, date, case number, action taken, incident description, status and disposition	Weekly	Formal sanctions against members of financial and health care services industries by a range of Federal and State regulatory agencies including, but not limited to: NASD, SEC, HUD, the stock exchanges and state real estate commissions.
Statewide Public Records Person Search	Date elements vary according to data type	See above	All public records for a given state
Florida Accidents		Quarterly	Traffic Accident Reports for the State of Florida.
News	Source, date, headline, text of the article or story	Daily	Contains full text articles from over 19000 English language news sources and other publications.
Negative News	Source, date, headline, text of the article or story	Daily	Contains full text articles from over 19000 English language news sources and other publications. A negative connotation search string has been prebuilt so that most articles retrieved will reflect negative treatment of the search subject.
LexisNexis Corporate Affiliations	Corporate Identity: name, private, public or international status, ticker symbol and exchange, state of incorporation, address, telephone and fax number; Descriptive Data: year founded, number of employees, ownership percentage, primary business activities, SIC Code(s), product brands, and computer systems in use; Current Financials: sales, revenue, net income/earnings, net worth, general assets and liabilities, pension assets, and fiscal year-ends; Personnel: names and titles for more than 280,000 top executives, including CEO's, marketing vice presidents, financial officers, board of directors, purchasing agents and more; Outside Service Firms: such as legal firms, auditors, insurance carriers, bankers, pension managers, and transfer agents for the companies listed.	Daily	Contains profile information and corporate linkage to the eighth level for more than 182,000 public and private companies (including more than 62,000 parent companies worldwide).
Thomson Directories		Monthly	
Mergerstat	Company Names, Addresses, Ticker Symbols, Narratives	Annually	An annual publication tracking mergers and acquisitions activity involving U.S. companies. The publication reports and analyzes publicly announced acquisitions of \$1 million or more in 50 industry classifications.
Hoovers Company Capsules	Company Name, Address, CEO, CFO and Chief Human Resources Officer, Sales and one-year sales change, Fiscal year end, Stock Exchange and Symbol, Industry, and a brief overview of operations.		Domestic companies usually demonstrate revenues in excess of \$10 million, substantial assets/net worth, or a work force in excess of 300 persons while non-U.S. based companies usually demonstrate revenues in excess of \$50 million.
SEC Filings	Varies by form	Daily	Required SEC filings for all publicly traded companies
Standard and Poor's Corporate Descriptions Plus News	Company Name, Address, Phone, Fax, Officers and Directors, Financial Statements Fiscal year end, Stock Exchange and Symbol, Industry, and a brief overview of operations.	Daily	Contains profiles and news on more than 9,300 US public companies.
GuideStar	Company Name, Address, Phone, Fax, Officers and Directors.	Quarterly	Provides information on nonprofit organizations such as verifying a nonprofit's legitimacy, learning whether a contribution will be tax deductible, or finding out more about its mission, programs, and finances.
Find a Business	Name, Address, Phone numbers, Principals, FEIN	Daily	A database combined from over 200 sources containing nationwide business locator information for approximately 150 million unique businesses based in the US and territories. Sources include Secretary of State filings, DBA filings, phone publishers, the Electronic Directory Assistance database, numerous other public record sources and marketing, registrations and warranty card aggregators.
Secretary of State Filings	Business name, address, principal information, corporate or filing numbers, registered agent and address (where applicable), business started, date filed and status date, status	Varies by state - most weekly, many monthly	Secretary of State filings from all states except DE. "Doing Business As" data from all 50 states.
UCC Liens	Debtor name and address, creditor name and address, number, filing and/or release dates, UCC type, collateral	Weekly	Uniform Commercial Code filings from all 50 states

D & B Global Market Identifiers	Company name and address and telephone, principals, parent information, sales and employment statistics, charter, duns and FEIN numbers, NASIC codes and descriptions.	Quarterly	The D&B Global Market Identifier is a global offering of Dun and Bradstreet's Market Identifier WorldBase. This file includes US and non-US business records, on both public and private companies in over 220 countries.
D & B FEIN	Business Name and Address, Company Executives, Parent and Headquarter Information, DUNS number and SIC code.	Quarterly	A partial listing of the Federal Employer Identification Numbers (FEIN) assigned by the Federal Government to business entities expected to file federal tax returns. Note that D&B derives this information from a number of sources, none of which are the assigning federal office, and it is not intended to be a comprehensive list of all assigned FEIN numbers.
D & B DUNS Minority & Women-Owned Businesses	Business Name and Address, Company Executives, Parent and Headquarter Information, DUNS number and SIC code.	Monthly	An extensive file of businesses that are 50% owned and operated by a woman and/or minority.
D & B Private Company Insights	Business Name and Address, Company Executives, including biographies, Parent and Headquarter Information, DUNS number, financial information, income, business ratios and open liens, judgements and lawsuits, and SIC code.	Quarterly	Provides key company information for the top 250,000 private companies ranked by total sales in the US.
Experian Business Reports	Company name and address and telephone, principals, trade information, public filings	Quarterly	Experian Business Credit Report for 8 million domestic companies and 5 million business owners.
Smartlinx Person Report	see description		The Person Report file contains reports for individuals. The reports are analytically generated from select public record and publicly available data, done to rigorous quality and consistency standards.
			The reports contain categories of descriptive information about that individual - including assets, addresses, associates, relatives, neighbors, lien, bankruptcy and other information.
			The reports also contain hypertext links to the original source documents used to compile the Summary Report, as well as links to associated people, businesses and locations.
Smartlinx Business Report	see description		The Business Report file contains reports for businesses and other organizations. The reports are analytically generated from select public records holdings on all entities, done to rigorous quality and consistency standards.
			The reports contain categories of descriptive information about that organization - including assets, addresses, associates, lien, bankruptcy and other information.
			The reports also contain hypertext links to the original source documents used to compile the Summary Report, as well as links to associated people, businesses and locations.
Smartlinx Location Report	see description		The Location Summary Report file contains reports for locations - deliverable, valid addresses recognized by the United States Postal Service. The reports are analytically generated from select public records holdings on all entities, done to rigorous quality and consistency standards.
			Location Summary Reports contain categories of descriptive information about that site - including tax assessment, deed transfer, mortgage information, addresses, associates, and other information.
			The Summary Reports contain hypertext links to the original source documents used to compile the Summary Report, as well as links to associated people, businesses and neighbors.

EXHIBIT - 2



NOTICE COST SUMMARY

Estimate #1

Total Estimated Direct and Indirect Notice Cost To Reach Minimum 80% of Class Assuming Direct Mail for 60% of Class:

Total Direct Mailing Cost:	\$	1,115,514
Total Estimated Supplemental Notice Cost:	\$	328,496
Total Estimated Direct and Supplemental Notice Cost:	\$	<u><u>1,444,009</u></u>

Estimate #2

Total Estimated Direct and Indirect Notice Cost To Reach Minimum 80% of Class Assuming Direct Mail for 63% of Class:

Total Direct Mailing Cost:	\$	1,175,506
Total Estimated Supplemental Notice Cost:	\$	321,437
Total Estimated Direct and Supplemental Notice Cost:	\$	<u><u>1,496,944</u></u>

Estimate #3

Total Estimated Direct and Indirect Notice Cost Assuming Direct Mail for 85% of Class:

Total Direct Mailing Cost:	\$	1,572,245
Estimated Cost Of Supplemental Notice Suggested To Reach Class Through Multiple Channels:	\$	125,710
Total Estimated Direct and Supplemental Notice Cost:	\$	<u><u>1,697,955</u></u>

Direct Notice	Notice Phases and Outside Budget		Reach Analysis - Class Size: 4,100,000			
85%	<u>PHASE I: 0-40 days from Preliminary Approval</u>		<u>Random Media Combination</u>			
	Direct Notice	tbd	Direct	1	85.00%	0.15
	USPS to approx. 4.1 million		Print	1	9.10%	0.909
	Print Publication	\$ 81,298	Supplemental Efforts	1	0.50%	0.995
	<i>Sports Illustrated</i>		Online Banners	1	25%	0.75
	<i>USA Today</i>		0.15 x 0.909 x 0.995 x 0.75 = 0.1017512			
	Press Release, Online Ads & Outreach	\$ 44,412	1 - 0.102 = 0.8982488			
Banners, Outreach, Google, Facebook		REACH: 89.8%				
Press Release						
TOTAL COST:		\$ 125,710				
ESTIMATED REACH WITH 5-10X FREQUENCY:		89.82%				
63%	<u>PHASE I: 0-40 days from Preliminary Approval</u>		<u>Random Media Combination</u>			
	Direct Notice	tbd	Direct	1	63.00%	0.37
	Email/USPS to approx. 2.9 million		Print	1	17.80%	0.822
	Print Publication	\$ 51,298	Supplemental Efforts	1	0.50%	0.995
	<i>Sports Illustrated</i>		Online Banners	1	47%	0.53
	Press Release, Online Ads & Outreach	\$ 109,624	0.37 x 0.822 x 0.995 x 0.53 = 0.1603882			
	Banners, Outreach, Google, Facebook		1 - 0.160 = 0.8396118			
	Press Release		REACH: 84.0%			
	\$ 160,922					
	<u>PHASE II</u>					
	Print Publication	\$ 81,692				
	<i>ESPN the Magazine</i>					
	<i>USA Today</i>					
Press Release, Online Ads & Outreach	\$ 78,823					
Banners, Outreach, Google, Facebook						
Press Release						
\$ 160,515						
TOTAL COST:		\$ 321,437				
ESTIMATED REACH WITH 5-10X FREQUENCY:		83.96%				
60%	<u>PHASE I: 0-40 days from Preliminary Approval</u>		<u>Random Media Combination</u>			
	Direct Notice	tbd	Direct	1	60.00%	0.4
	USPS to approx. 2.9 million		Print	1	17.80%	0.822
	Print Publication	\$ 51,298	Supplemental Efforts	1	0.50%	0.995
	<i>Sports Illustrated</i>		Online Banners	1	50%	0.5
	Press Release, Online Ads & Outreach	\$ 109,624	0.4 x 0.822 x 0.995 x 0.5 = 0.163578			
	Banners, Outreach, Google, Facebook		1 - 0.164 = 0.836422			
	Press Release		REACH: 83.6%			
	\$ 160,922					
	<u>PHASE II</u>					
	Print Publication	\$ 81,692				
	<i>ESPN the Magazine</i>					
	<i>USA Today</i>					
Press Release, Online Ads & Outreach	\$ 85,882					
Banners, Outreach, Google, Facebook						
Press Release						
\$ 167,574						
TOTAL COST:		\$ 328,496				
ESTIMATED REACH WITH 5-10X FREQUENCY:		83.64%				

ESTIMATE #1

February 23, 2015

Johanna Spellman, Esq. - NCAA Liaison Counsel
Latham & Watkins LLP

Matter: NCAA Student Athlete Concussion Litigation - Administration Cost Estimate



NOTICE ADMINISTRATION COST ESTIMATE SUMMARY

KEY ASSUMPTIONS:

- 1 - Estimated class of 4.1 million individuals
- 2 - Direct notice will consist of single postcard mailed to 2.9 million Class Members
- 3 - Toll-free number with Interactive Voice Recording ("IVR")
- 4 - Static case-dedicated website to host case documents and information

CLASS SIZE:

Total Estimated Class Size	4,100,000
Class Members To Be Mailed Direct Notice via USPS	2,900,000

SERVICES:

Notification Procedures	
Mailing Prep & Data Prep	\$ 5,295
Printing/Mailing	776,332
RUM Handling & Address Searches	332,386
Website Development	1,500
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Total Direct Mailing Cost:	\$ 1,115,514
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TOTAL ESTIMATED NUMBER OF CLASS MEMBERS REACHED THROUGH DIRECT MAIL:	2,465,000
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ESTIMATED PERCENTAGE OF TOTAL CLASS MEMBERS REACHED THROUGH DIRECT NOTICE:	60%
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TOTAL DIRECT MAIL COST:	\$ 1,115,514
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TOTAL ESTIMATED COST OF SUPPLEMENTAL NOTICE REQUIRED TO ENSURE 80% REACH OF CLASS MEMBERS:	\$ 328,496
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TOTAL ESTIMATED DIRECT AND SUPPLEMENTAL NOTICE COST:	\$ 1,444,009
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February 23, 2015

Johanna Spellman, Esq. - NCAA Liaison Counsel
 Latham & Watkins LLP
 Matter: NCAA Student Athlete Concussion Litigation - Administration Cost Estimate
 Page 2 of 2



NOTIFICATION PROCEDURES

	Unit Rate	Volume	Cost	Total
Mailing Prep & Data Prep				
NCOA Update			\$ 795	
Data preparation	\$ 90.00	50 hrs	4,500	
Subtotal Mailing Prep & Data Prep				5,295
Printing/Mailing				
Notice Packet:				
4.25" x 6" Single Postcard	\$ 0.02	2,900,000	\$ 47,082	
Estimated 1st Class Postage	\$ 0.251	2,900,000	727,900	
Print Production Staff Hours	\$ 90.00	15 hrs	1,350	
Subtotal Notice				776,332
Returned Undeliverable Mail ("RUM") Handling & Address Searches				
Estimated % and Number of RUM Notice Packets	30%	870,000		
RUM Scanning	\$ 0.04	870,000	\$ 34,800	
Address Searches	\$ 0.20	870,000	174,000	
Percentage of RUM returned with SSN available for Search	50%	435,000		
Percentage of RUM returned without SSN available for Search	50%	435,000		
Amount of New Addresses Found (SSN) and Remail Cost	80% \$ 0.02	348,000	6,647	
Amount of New Addresses Found (without SSN) and Remail Cost	50% \$ 0.02	217,500	4,154	
Estimated 1st Class Postage	\$ 0.251	435,000	109,185	
Staff Hours Performing RUM & Remail Services	\$ 90.00	40 hrs	3,600	
Subtotal RUM Handling & Address Searches				332,386
Website Development				
Static case-dedicated website with case information and documents			\$ 1,500	1,500
Subtotal Notification Procedures				\$ 1,115,514

ESTIMATE #2

February 23, 2015

Johanna Spellman, Esq. - NCAA Liaison Counsel
Latham & Watkins LLP

Matter: NCAA Student Athlete Concussion Litigation - Administration Cost Estimate



NOTICE ADMINISTRATION COST ESTIMATE SUMMARY

KEY ASSUMPTIONS:

- 1 - Estimated class of 4.1 million individuals
- 2 - Direct Notice by email and/or postal mail to 2.9 million Class Members
- 3 - Email blast of Notice to 1.45 million Class Members
- 4 - Postcard Notice mailed to 2.9 million Class Members
- 5 - Toll-free number with Interactive Voice Recording ("IVR")
- 6 - Static case-dedicated website to host case documents and information

CLASS SIZE:

Total Estimated Class Size	4,100,000
Class Members To Be Mailed Direct Notice via USPS/Email	2,900,000

SERVICES:**Notification Procedures**

Mailing Prep & Data Prep	\$ 5,295
Email Blast	\$ 31,043
Printing/Mailing	773,153
RUM Handling & Address Searches	364,516
Website Development	1,500
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Total Direct Mailing Cost:	<u>\$ 1,175,506</u>
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TOTAL ESTIMATED NUMBER OF CLASS MEMBERS REACHED THROUGH DIRECT MAIL:	2,595,500
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ESTIMATED PERCENTAGE OF TOTAL CLASS MEMBERS REACHED THROUGH DIRECT NOTICE:	63%
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TOTAL DIRECT MAIL COST:	\$ 1,175,506
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TOTAL ESTIMATED COST OF SUPPLEMENTAL NOTICE REQUIRED TO ENSURE 80% REACH OF CLASS MEMBER:	\$ 321,437
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TOTAL ESTIMATED DIRECT AND SUPPLEMENTAL NOTICE COST:	<u>\$ 1,496,944</u>
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February 23, 2015

Johanna Spellman, Esq. - NCAA Liaison Counsel
 Latham & Watkins LLP
 Matter: NCAA Student Athlete Concussion Litigation - Administration Cost Estimate
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NOTIFICATION PROCEDURES

	Unit Rate	Volume	Cost	Total
Mailing Prep & Data Prep				
NCOA Update			\$ 795	
Data preparation	\$ 90.00	50 hrs	4,500	
Subtotal Mailing Prep & Data Prep				5,295
Email Blast				
Staff time prepping and verifying email address data	\$ 90.00	10 hrs	\$ 900	
Mass Email Notice	\$ 0.021	1,450,000	30,143	
Subtotal Email Services				31,043
Printing/Mailing				
Total Class Members receiving postal mail Notice		2,900,000		
Notice Packet:				
4.25" x 6" Single Postcard	\$ 0.02	2,900,000	\$ 44,353	
Estimated 1st Class Postage	\$ 0.251	2,900,000	727,900	
Print Production Staff Hours	\$ 90.00	10 hrs	900	
Subtotal Notice				773,153
Returned Undeliverable Mail ("RUM") Handling & Address Searches				
Estimated % and Number of RUM Notice Packets	30%	870,000		
RUM Scanning	\$ 0.04	870,000	\$ 34,800	
Address Searches	\$ 0.20	870,000	174,000	
Percentage of RUM returned with SSN available for Search	50%	435,000		
Percentage of RUM returned without SSN available for Search	50%	435,000		
Amount of New Addresses Found (SSN) and Remail Cost	80% \$ 0.02	348,000	6,262	
Amount of New Addresses Found (without SSN) and Remail Cost	50% \$ 0.02	217,500	3,913	
Estimated 1st Class Postage	\$ 0.251	565,500	141,941	
Staff Hours Performing RUM & Remail Services	\$ 90.00	40 hrs	3,600	
Subtotal RUM Handling & Address Searches				364,516
Website Development				
Static case-dedicated website with case information and documents			\$ 1,500	1,500
Subtotal Notification Procedures				\$ 1,175,506

ESTIMATE #3

February 23, 2015

Johanna Spellman, Esq. - NCAA Liaison Counsel
Latham & Watkins LLP

Matter: NCAA Student Athlete Concussion Litigation - Administration Cost Estimate



NOTICE ADMINISTRATION COST ESTIMATE SUMMARY

KEY ASSUMPTIONS:

- 1 - Estimated class of 4.1 million individuals
- 2 - Direct notice will consist of single postcard mailed to 4.1 million Class Members
- 3 - Toll-free number with Interactive Voice Recording ("IVR")
- 4 - Static case-dedicated website to host case documents and information

CLASS SIZE:

Total Estimated Class Size	4,100,000
Class Members To Be Mailed Direct Notice via USPS	4,100,000

SERVICES:**Notification Procedures**

Mailing Prep & Data Prep	\$ 5,295
Printing/Mailing	1,097,015
RUM Handling & Address Searches	468,436
Website Development	1,500
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Total Direct Mailing Cost:	<u>\$ 1,572,245</u>
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TOTAL ESTIMATED NUMBER OF CLASS MEMBERS REACHED THROUGH DIRECT MAIL:	3,485,000
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ESTIMATED PERCENTAGE OF TOTAL CLASS MEMBERS REACHED THROUGH DIRECT NOTICE:	85%
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TOTAL DIRECT MAIL COST:	\$ 1,572,245
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ESTIMATED COST OF SUPPLEMENTAL NOTICE SUGGESTED TO REACH CLASS THROUGH MULTIPLE CHANNELS:	<u>\$ 125,710</u>
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TOTAL ESTIMATED DIRECT AND SUPPLEMENTAL NOTICE COST:	<u><u>\$ 1,697,955</u></u>
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February 23, 2015

Johanna Spellman, Esq. - NCAA Liaison Counsel
 Latham & Watkins LLP
 Matter: NCAA Student Athlete Concussion Litigation - Administration Cost Estimate
 Page 2 of 2



NOTIFICATION PROCEDURES

	Unit Rate	Volume	Cost	Total
Mailing Prep & Data Prep				
NCOA Update			\$ 795	
Data preparation	\$ 90.00	50 hrs	4,500	
Subtotal Mailing Prep & Data Prep				5,295
Printing/Mailing				
Notice Packet:				
4.25" x 6" Single Postcard	\$ 0.02	4,100,000	\$ 66,565	
Estimated 1st Class Postage	\$ 0.251	4,100,000	1,029,100	
Print Production Staff Hours	\$ 90.00	15 hrs	1,350	
Subtotal Notice				1,097,015
Returned Undeliverable Mail ("RUM") Handling & Address Searches				
Estimated % and Number of RUM Notice Packets	30%	1,230,000		
RUM Scanning	\$ 0.04	1,230,000	\$ 49,200	
Address Searches	\$ 0.20	1,230,000	246,000	
Percentage of RUM returned with SSN available for Search	50%	615,000		
Percentage of RUM returned without SSN available for Search	50%	615,000		
Amount of New Addresses Found (SSN) and Remail Cost	80% \$ 0.02	492,000	9,397	
Amount of New Addresses Found (without SSN) and Remail Cost	50% \$ 0.02	307,500	5,873	
Estimated 1st Class Postage	\$ 0.251	615,000	154,365	
Staff Hours Performing RUM & Remail Services	\$ 90.00	40 hrs	3,600	
Subtotal RUM Handling & Address Searches				468,436
Website Development				
Static case-dedicated website with case information and documents			\$ 1,500	1,500
Subtotal Notification Procedures				\$ 1,572,245

EXHIBIT - 3



SITES WITH ROSTER DATA

Sport	*Year Established	**Est. Schools	Website
Baseball	1906	302	www.thebaseballcube.com
Basketball (M)	1906	400	www.sports-reference.com
DI	1982	288	http://campus.mst.edu/athleticarchives/hoops/d2basketball/d2hoops.html
DIII	1982	400	http://www.d3hoops.com/landing/index
Basketball (W)	1906	360	http://tulsaworld.sportsdirectinc.com/basketball/womens-ncaab-players.aspx?page=/data/wncab/teams/rosters/roster664559.html
DI	1982	288	http://campus.mst.edu/athleticarchives/hoops/d2basketball/d2hoops.html
DIII	1982	400	http://www.d3hoops.com/landing/index
Bowling	2004	390	http://www.collegebowling.com/teams.asp
Cross Country / Track & Field	1938	829	http://www.tfrs.org/teams/1200.html#
Fencing	1941	43	www.collegefencing360.com
Field Hockey	1981	124	www.ncaa.com
Football	1906	128	www.sports-reference.com
DI	1973	200	http://www.d2football.com/
DIII	1973	244	http://www.d3football.com/landing/index
Golf	1939	460	www.golfhelp.com
Gymnastics	1938	90	http://www.troester.com/gym/
Ice Hockey	1948	108	www.uscho.com
Lacrosse	1971	732	www.laxpower.com
Rifle Sports	1980	33	www.rose-hulman.edu
Rowing	1997	140	www.ncaa.com
Skiing	1954	40	www.ncaa.com
Soccer	1959	200	http://www.soccertimes.com/ncaa.htm
Softball	1982	971	www.ncaa.com
Swimming & Diving	1982	567	www.collegeswimming.com
Tennis	1946	620	www.collegetennisonline.com
Volleyball	1981	474	www.volleyball.org
Water Polo	1969	111	www.collegewaterpolocoach.org
Wrestling	1927	245	www.ncwa.net

*The year in which the NCAA sanctioned the sport.

** The estimated number of schools that participate in the sport as an NCAA member (formula takes first year of sport times number of years and assumes schools participating have doubled since inception)

OTHER SITES WITH POTENTIAL ROSTER DATA

Schools	Website	Years	Sports / Rosters
NCAA Division I,II,III	www.fanbase.com	As far back as 1949 for certain sports	Baseball, Basketball, W Bowling, Boxing, M/W Cross Country, M/W Fencing, Football, M/W Golf, M/W Gymnastics, M/W Ice Hockey, M/W Lacrosse, Rifle, Women's Rowing, Skiing, M/W Soccer, Softball, M/W Swimming/Diving, M/W Tennis, M/W I/O Track & Field, M/W Volleyball, M/W Water Polo, Wrestling
N/A	www.stats.com	N/A	Hockey, Football, Basketball
DI	www.cpssports.com	Current	Football, Men's Basketball
DI	www.espn.com	Current	Football, Men's Basketball
N/A	www.statSheet.com	N/A	Men's Basketball
DI	www.sports-reference.com	Some records go back to the 19th Century	Football, Men's Basketball
N/A	www.sportsdirectinc.com	N/A	Baseball, Men's Basketball, Football, Hockey
NCAA Division I,II,III	web1.ncaa.org/onlineDir/	Current	All
N/A	www.infoplease.com	N/A	Soccer, Bowling, Boxing, Basketball, Football, Hockey, Baseball, Tennis